

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Varsalles Phillips

Case No. Case: 2:25-mj-30009
Assigned To : Unassigned
Assign. Date : 1/15/2025
Description: CMP USA V. PHILLIPS
(DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 14, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C § 922(g)(1) Felon in Posession of a Firearm

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

Complainant's signature

Jessica Sumyk, Special Agent
Printed name and title

Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

Date: January 15, 2025

City and state: Detroit, MI

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Jessica Sumyk, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2014 and am currently assigned to the FBI Detroit Division. I currently work on the Southeast Michigan Trafficking and Exploitation Crimes (SEMTEC) Task Force. I have experience investigating child sexual exploitation and human trafficking crimes and have also been trained specifically on these types of investigations. I have consulted with numerous other SEMTEC agents, including those that have worked on crimes-against-children investigations, including child pornography and child sexual exploitation. I have experience investigating firearm related crimes and have also received training with regards to firearms.

2. As an FBI Special Agent, I am authorized to investigate violations of the laws of the United States, and I am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for VARSALLES PHILLIPS for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

4. The statements contained in this affidavit are based in part on information provided by other law enforcement officers, information conveyed to me by other law enforcement officials, and my experience, training, and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing a complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that VARSALLES PHILLIIPS has violated the offense referenced in this complaint.

PROBABLE CAUSE

6. SEMTEC is investigating PHILLIPS for sex trafficking a 15-year-old girl who was reported missing. On January 14, 2025, SEMTEC agents and task force officers executed a state search warrant at PHILLIPS' residence in Detroit, Michigan, looking for that girl. Agents knocked and announced their presence, and that 15-year-old girl answered the door. When agents entered the house, they immediately saw in plain view a firearm on the mantle in the front living room. The firearm was a loaded Glock 23 pistol with an extended magazine, bearing serial number NFG246.

7. During a search of the house, agents found a loaded Smith & Wesson M& P Shield pistol, bearing serial number HSE4314, under a mattress in one of

the bedrooms. A query of serial number HSE4314 through the Law Enforcement Intelligence Network (LEIN) returned a record for a Stolen Gun entered by the Detroit Police Department.

8. During the search, agents found PHILLIPS hiding in the attic of the house. Agents found PHILLIPS' wallet, which contained his driver's license, in the bathroom. The address on his driver's license was the address of the house being searched.

9. During a Mirandized interview, PHILLIPS stated he was homeless but previously lived at the residence being searched. PHILLIPS stated he arrived at the house an hour prior and was going to get his hair done. PHILLIPS stated he was recently discharged from parole.

10. The 15-year-old girl stated her boyfriend, "Lump" or "Lamar," stays at the house. The 15-year-old girl identified the individual who was located in the attic during the execution of the search warrant as her boyfriend. Agents identified that individual as PHILLIPS. The 15-year-old girl stated PHILLIPS was the only individual who stayed at the house. The 15-year-old girl stated she knew about the guns in the house, but they were not her guns, and she did not know who they belonged to.

11. There is probable cause to believe that the firearms were manufactured outside of the state of Michigan. Special Agent Kara Klupacs with

the Bureau of Alcohol, Tobacco, and Firearms viewed photographs of the firearms, and based on her preliminary review of the images, Special Agent Klupacs determined the firearms were not manufactured in the state of Michigan. There is therefore probable cause to believe that the firearms traveled in or affected interstate commerce before coming into PHILLIPS' possession.

12. A criminal history check revealed that before January 14, 2025, PHILLIPS was convicted of (1) False Pretenses - \$1,000 or More but Less Than \$20,000 and Financial Transaction Device – Illegal Sale/Use in the 38th Circuit Court in Michigan; (2) Attempt False Pretenses - \$1,000 or More But Less Than \$20,000 in the Sixth Circuit Court in Michigan; (3) Identity Theft in the Third Circuit Court in Michigan; and (4) Home Invasion – Second Degree in the Sixteenth Circuit Court in Michigan. Each of those convictions carry a maximum penalty of over one year in prison.

CONCLUSION

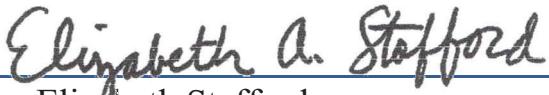
13. Based on the foregoing, there is probable cause to believe that VARSALLES PHILLIPS committed violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

Respectfully submitted,



Jessica Sumyk, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Elizabeth A. Stafford".

Hon. Elizabeth Stafford
United States Magistrate Judge

Dated: January 15, 2025